

ANTHONY L. RICCO

ATTORNEY AT LAW

20 VESEY STREET • SUITE 400
NEW YORK, NEW YORK 10007

TEL (212) 791-3919
FAX (212) 964-2926

to nyricco@aol.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/26/2022

STEVEN Z. LEGON
OF COUNSEL

September 26, 2022

Hon. Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Juan Jiggetts*, Docket No. 21 Cr. 664 (AT)

Dear Judge Torres:

This letter motion is respectfully submitted to request a 60 day adjournment of the status conference which is presently scheduled for October 6, 2022 at 10:00 a.m., as the parties continue the process of plea negotiations, and both defense counsel and the defendant, Juan Jiggetts, continue to review a massive amount of electronic discovery material in this case. Moreover, just last week, the government completed its production of up to 100 gigabytes of additional Rule 16 discovery material in this case, but there have been some technical difficulties with opening the electronic files, which the parties are actively in the process of trying to resolve.

Additionally, last Monday, September 19, 2022, I began jury selection in *United States v. Jesus Feliciano Trinidad*, Docket No. 19 Cr. 152 (JS), in the Eastern District of Pennsylvania before Chief Judge Juan Sanchez. I represent the lead defendant, Jesus Feliciano Trinidad, under the Criminal Justice Act, in a complex R.I.C.O. / narcotics conspiracy case, which involves six murders, and which had been a death eligible case. The trial is expected to last approximately two months, and due to the extended length and complexity of the Feliciano Trinidad trial - a case in which the government intends to call 146 witnesses - I will be living in Philadelphia throughout the duration of the trial, but can make myself available on Fridays, when we will not be sitting for trial.

Defense counsel has conferred with the government regarding this application, and the government does not have any objection. Additionally, defense counsel

consents to exclusion of speedy trial time in the above-referenced matter, pursuant to 18 U.S. Code § 3161, until the date of the next scheduled status conference.

Thank you for your attention to this matter. If there are any questions, or if any additional information is required, please contact me at your Honor's convenience.

Respectfully,

Anthony L. Ricco

Anthony L. Ricco


ALR/jh

cc: A.U.S.A. Andrew Rohrbach (By E.C.F.)

GRANTED. The status conference scheduled for October 6, 2022, is ADJOURNED to **December 6, 2022**, at **10:00 a.m.** It is further ORDERED that the time until December 6, 2022, is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7), because the ends of justice served by excluding such time outweigh the interests of the public and Defendant in a speedy trial in that this will allow time for the parties to produce and review discovery, as well as explore pretrial resolutions.

SO ORDERED.

Dated: September 26, 2022
New York, New York



ANALISA TORRES
United States District Judge